

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

In Re:

CITY OF DETROIT, MICHIGAN,

Debtor,

Chapter 9

Case #: 13-53846

Hon. Steven W. Rhodes

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**PLAINTIFF COUNSEL'S MOTION TO WITHDRAW AS COUNSEL AS TO PROOF
OF CLAIM #1155**

NOW COMES Plaintiff's Counsel, **CHRISTOPHER TRAINOR & ASSOCIATES**, and requests that this Honorable Court enter an Order allowing Plaintiff's Counsel to withdraw as counsel for Plaintiff for the following reasons:

1. That this case was filed on October 7, 2011, arising out of an incident which occurred on October 9, 2008, between the City of Detroit and Gregory Phillips.
2. Dominique McCartha is the personal representative for the Estate of Gregory Phillips.
3. There has been a complete and total breakdown of the attorney-client relationship to the extent that it has impaired Plaintiff's Counsel's ability to properly represent Plaintiff and to adequately prepare his case for trial.
4. Based upon the foregoing, Plaintiff's Counsel absolutely cannot continue as attorneys for Plaintiff pursuant to Michigan Rule of Professional Conduct 1.16.
5. Petitioner, Christopher Trainor filed Proof of Claim number 1155 in this matter.
6. Petitioner, Christopher Trainor is requesting to withdraw as counsel as to Proof of Claim number 1155 and as to the entire matter in the Eastern District of Michigan Southern Division.

WHEREFORE, Petitioner CHRISTOPHER TRAINOR & ASSOCIATES hereby respectfully requests that this Honorable Court enter an order allowing them to withdraw as counsel for Plaintiff.

Respectfully Submitted,
CHRISTOPHER TRAINOR & ASSOCIATES



CHRISTOPHER J. TRAINOR (P42449)

AMY J. DEROUIN (P70514)

Attorneys for Plaintiff

9750 Highland Road

White Lake, MI 48386

(248) 886-8650

Dated: August 26, 2014
CJT/vjc

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
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**ORDER GRANTING PETITIONER, CHRISTOPHER TRAINOR'S MOTION TO
WITHDRAW FROM PROOF OF CLAIM #1155**

Upon consideration of the motion of Petitioner, Christopher Trainor

IT IS hereby ORDERED that the Christopher Trainor is Withdrawn as Counsel for Dominique McCarthy as Personal Representative of the Estate of Gregory Phillips as his representation relates to Proof of Claim #1155 and as to the case filed in the Eastern District of Michigan, Southern Division

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

FILED

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PLEASE TAKE NOTICE that on September 2, 2014, Petitioner Christopher Trainor, filed the *PLAINTIFF COUNSEL'S MOTION TO WITHDRAW AS COUNSEL AS TO PROOF OF CLAIM #1155* in the United States Bankruptcy Court for the Eastern District of Michigan seeking entry withdrawal as Counsel for Dominique McCartha as Personal Representative of the Estate of Gregory Phillips as to Proof of Claim #1155.

PLEASE TAKE FURTHER NOTICE that your rights may be affected by the relief sought in the Motion. You should read these papers carefully and discuss them with your attorney, if you have one. If you do not have an attorney, you may wish to consult one.

PLEASE TAKE FURTHER NOTICE that if you do not want the Bankruptcy Court to grant the Motion or you want the Bankruptcy Court to consider your views on the Motion, by **September 16, 2014**, you or your attorney must:

File with the Bankruptcy Court a written response to the Motion, explaining your position, electronically through the Bankruptcy Court's electronic case filing system in accordance with the Local Rules of the Bankruptcy Court or by mailing any objection or response to:¹

United States Bankruptcy Court
211 West Fort Street
Detroit, MI 48226

_____/

¹

A response must comply with F. R. Civ. P. 8(b), (c) and (e).

You must also serve a copy of any objection or response upon:

CHRISTOPHER TRAINOR & ASSOCIATES

9750 Highland Road

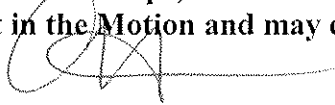
White Lake, MI 48386

Phone: (248) 886-8650

Fax: (248) 689-3321

If an objection or response is timely filed and served, the clerk will schedule a hearing on the Motion and you will be served with a notice of the date, time and location of the hearing.

PLEASE TAKE FURTHER NOTICE that if you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the Motion and may enter an order granting such relief.



CHRISTOPHER J. TRAINOR (P42449)

Christopher Trainor & Associates

9750 Highland Road

White Lake, MI 48386

Phone: (248) 886-8650

shanna.suver@cjtrainor.com

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
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CERTIFICATE OF SERVICE

The undersigned certifies that she caused the following document to be served as follows:

Document Served: *PLAINTIFF COUNSEL'S MOTION TO WITHDRAW AS COUNSEL AS TO PROOF OF CLAIM #1155*

Method of Service: Via First Class mail Dominique McCarthy as Personal Representative of the Estate of Gregory Phillips, 5542 Alter Road, Detroit, Michigan 48224.

Date of Service: August 26, 2014


CHRISTOPHER J. TRAINOR (P42449)
Christopher Trainor & Associates
9750 Highland Road
White Lake, MI 48386
Phone: (248) 886-8650
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FILED

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U.S. BANKRUPTCY COURT
E.D. MICHIGAN DETROIT